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June 6, 2005

VIA FACSIMILE

John M. Berns, Esq.
Merchant & Gould
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

Re: *Glaxo Group Limited v. Teva Pharmaceuticals USA, Inc. and Teva Pharmaceutical Industries Limited*, Civil Action No. 04-171-KAJ

Dear John:

At the recent depositions of Tamas Szederkenyi and Leslie Kyle requests were made on the record for documents identified by the witnesses. I am writing to request again that these documents be produced as soon as possible.

The following general descriptions of documents were identified and requested during the deposition of Mr. Szederkenyi:

- inventory records of documents collected (page 50, lines 4-8);
- Szederkenyi, Analytical Research and Development, Pharmaceutical Development, and Novopharm e-mails regarding ranitidine hydrochloride oral solution (pate 63, lines 17-24);
- index of laboratory notebooks (page 75, lines 1-6);
- organizational charts (page 98, line 24 to page 99, line 11);

- list or catalog of stability testing methods (page 103, lines 6-10);
- documentation sufficient to identify the formula that is lot 9I043 (page 106, lines 5-8);
- lab notebooks numbers 7427, 7452, 7473, 8328, and 8386 and the lab notebook numbers on page T7580 (page 136, lines 4-16);
- preformulation information package (page 142, lines 2-4);
- the entire file that was transferred from Novopharm to Teva regarding stability and any other testing that was done (page 150, lines 16-20); and
- Novopharm development reports identified on T2597 (page 153, lines 10-15).

The following general descriptions of documents were identified and requested during the deposition of Mr. Kyle:

- pages relating to ranitidine oral solution from the lab notebook marked as Exhibit 13, bates nos. T6573-6591 (page 93, lines 8-19);
- any documents relating to list number 6127 (page 97, lines 9-14);
- identity of person in Process Engineering assigned to the ranitidine oral solution project (page 109, line 21 to page 110, line 2);
- signed copy of Exhibit 15 (page 116, lines 9-11);
- protocols relating to ranitidine oral solution (page 147, line 23 to page 148, line 2);
- stability tests done by Quality Control or Quality Assurance on any ranitidine oral solution samples (page 150, lines 9-13);
- anything relating to ranitidine oral solution contained on the "N" drive (page 154, lines 20-25);
- Mr. Kyle's computer files relating to ranitidine oral solution (page 156, lines 11-16);
- earlier version of Exhibit 20 (page 163, lines 19-21);
- notebooks identified in Exhibit 21 to the extent not previously produced (page 172, lines 4-12);

- stability tests of Glaxo's Zantac syrup to the extent not previously produced (page 174, lines 11-16); and

- all documents in the "ranitidine file" that is referred to in Exhibit 25 (page 179, lines 21-25).

Please provide us with a time frame within which we can expect to receive these additional documents. I look forward to your prompt response.

Very truly yours,

Thomas J. Puppa